

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

**IN RE PUDA COAL SECURITIES INC.  
ET AL. LITIGATION**

Case No: 1:11-CV-2598 (DLC)

**CLASS ACTION**

**PLAINTIFFS' NOTICE OF MOTION AND MOTION FOR FINAL APPROVAL OF  
CLASS ACTION SETTLEMENTS WITH  
BREAN MURRAY, MACQUARIE, AND THE U.S. DIRECTORS**

Lead Plaintiffs Salomon Querub, Howard Pritchard, and Hotel Ventures LLC, and named plaintiffs Trellus Management Company LLC and Steven Weissmann (“Plaintiffs”) hereby move this Court for entry of Orders: (a) finally approving the Settlement with Defendant Macquarie Capital (USA) Inc. (“Macquarie”); (b) finally approving the Settlement with Defendant Brean Murray, Carret & Co. (“Brean”); (c) finally approving the Settlement with Defendants Lawrence S. Wizel (“Wizel”) and C. Mark Tang (“Tang”) (together, the “U.S. Directors”); (d) entering the Stipulated Judgment for Settlement Purposes Only Against the U.S. Directors; (e) entering the [Proposed] Bar and Judgment Reduction Order (c) finally certifying a Settlement Class (f) and finally approving the Plan of Allocation.

This motion is based on this Notice of Motion, the supporting Memorandum of Points and Authorities; the Declaration of Laurence Rosen and exhibits thereto, and the [Proposed] Orders and [Proposed] Judgment submitted concurrently herewith, and all pleadings, records and papers on file herein.

Dated: May 27, 2016

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that on this 27<sup>th</sup> day of May 2016, I served true and correct copies of the foregoing document, by posting the document electronically to the ECF website of the United States District Court for the Southern District of New York, for receipt electronically by the parties listed on the Court's service list.

*/s/ Sara E. Fuks*  
Sara E. Fuks